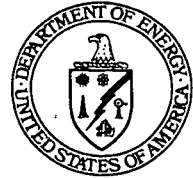




Department of Energy
Ohio Field Office
Fernald Environmental Management Project
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



5234

JAN 22 2004

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0105-04

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

**TRANSMITTAL OF RESPONSES TO COMMENTS ON THE DRAFT INTEGRATED REMEDIAL
DESIGN PACKAGE FOR THE AREA 6 OU1 STOCKPILE AREA**

- References:
1. Letter, J. Saric to J. Reising, "A6 OU1 Stockpile IRDP," dated October 16, 2003
 2. Informal Note, J. Chiou to J. Saric and T. Schneider, "Change Page to the Draft Area 6 OU1 Stockpile Area IRDP," dated October 21, 2003
 3. Letter, T. Schneider to J. Reising, "Disapproval - IP for Area 6 OU1 Stockpile Area," dated October 27, 2003
 4. Letter, J. Saric to J. Reising, "A6 OU1 Stockpile IRDP Final," dated October 29, 2003

Enclosed for your approval are responses to Ohio Environmental Protection Agency (OEPA) comments on the draft Integrated Remedial Design Package (IRDP) for the Area 6 Operable Unit 1 Stockpile Area. A change page correcting the list of applicable specifications was faxed to the United States Environmental Protection Agency (USEPA) and OEPA as noted in Reference 2 in response to the USEPA's October 16, 2003 disapproval. The USEPA then approved the document as noted in Reference 4. The IRDP will be finalized upon approval of these comment responses.

JAN 22 2004

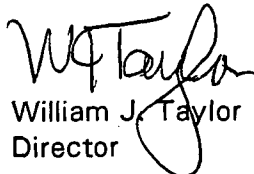
DOE-0105-04

Mr. James A. Saric
Mr. Tom Schneider

-2-

If you have any questions or need further information, please contact Johnny Reising at (513) 648-3139.

Sincerely,


William J. Taylor
Director

FCP:Reising

Enclosure: As Stated

cc w/enclosure:

D. Pfister, OH/FCP

J. Reising, OH/FCP

T. Schneider, OEPA-Dayton (three copies of enclosure)

G. Jablonowski, USEPA-V, SR-6J

M. Cullerton, Tetra Tech

F. Bell, ATSDR

M. Shupe, HSI GeoTrans

R. Vandegrift, ODH

AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

K. Johnson, OH/FCP

R. Abitz, Fluor Fernald, Inc./MS64

J. Chiou, Fluor Fernald, Inc./MS64

T. Hagen, Fluor Fernald, Inc./MS1

K. Harbin, Fluor Fernald, Inc./MS60

U. Kumthekar, Fluor Fernald, Inc./MS64

F. Miller, Fluor Fernald, Inc./MS64

T. Poff, Fluor Fernald, Inc./MS65-2

D. Powell, Fluor Fernald, Inc./MS64

A. Snider, Fluor Fernald, Inc./MS64

R. White, Fluor Fernald, Inc./MS52-5

W. Zebick, Fluor Fernald, Inc./MS60

ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE IMPLEMENTATION PLAN FOR
AREA 6 OU1 STOCKPILE AREA**

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

JANUARY 2004

U.S. DEPARTMENT OF ENERGY

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE IMPLEMENTATION PLAN FOR AREA 6 OU1 STOCKPILE AREA

ORIGINAL COMMENTS

1. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #: 1
Comment: This document does not provide line numbers. In future submittals, please provide the numbers to help facilitate the review and comment process.
Response: Agree.
Action: For future submittals of draft Implementation Plans, line numbers will be provided.
2. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #: 2
Comment: None of the maps provided show the current configuration of the area, such as the Waste Pit 4 Cap material and debris located north of it. Please include a current map.
Response: Agree.
Action: Figure 1-2 will be revised to show the Waste Pit 4 cap stockpile and debris located north of it.
3. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.4.3, 3.7 Pg. #: 1-6, 3-4 Line #: Code: C
Original Comment #: 3
Comment: These sections discuss interim grading as part of the remedial action inferring grading will occur before certification. As stated in the SEP, Section 2.5.13, rough or interim grading is to be performed *after* certification.
Response: Due to the relatively shallow depth of excavation within the OU1 Stockpile Area, there should be no grading required for long-term slope stability. However, grading will still be required after remedial excavation to establish perimeter ditches/berms to prevent runoff from adjacent non-certified areas from entering the excavation in accordance with Drawings 99X-5500-G-00793 and 99X-5500-G-00794. This is necessary to protect the area from recontamination.
Action: The first sentence in the last paragraph of Section 1.4.3 will be rewritten as follows:

"Minimum interim grading of the OU1 Stockpile Area to establish runoff control at the perimeter of the excavation will be performed as part of the remedial action prior to certification."
4. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.2 Pg. #: 2-2 Line #: Code: C
Original Comment #: 4
Comment: This section refers to the OU1 Stockpile Area as 6 acres, while the Executive Summary states 4.3 acres, and Section 1.2 states 5 acres. Please clarify.

Response: The boundary shown on Figure 1-2 referred to as the OU1 Stockpile Area is correct and comprises 4.3 acres. This boundary will replace the Area 6 SP-7/OU1 boundary shown on Figures 2-1 and 2-2. The text will be changed to agree with the revised figures.

Action: Replace the Area 6 SP-7/OU1 boundary in Figures 2-1 and 2-2 with the OU1 Stockpile Area boundary from Figure 1-2.

Revise the second sentence in Section 1.2 to read:

"The area is approximately 4.3 acres and is located west of the plant 1 Pad (74T), ..."

Revise the first sentence in Section 2.2 to read:

"The OU1 Stockpile Area is a flat, irregularly shaped area of approximately 4.3 acres lying between the waste pits and the former process area."

5. **Commenting Organization:** OEPA **Commentor:** OFFO
Section #: 2.2 **Pg. #:** 2-2 **Line #:** **Code:** C
Original Comment #: 5

Comment: This section states the 'OU1 Stockpile Area is a flat, irregularly shaped... The northern part of the area is the former site of SP-7 and includes the current lined, above-WAC stockpile area'. This paragraph implies that SP-7 is part of the area addressed in this document for remedial activities. Other areas of the document exclude SP-7. Please clarify when SP-7 will be addressed and in what document.

Response: Text in this document will be revised to more clearly indicate that SP-7 is not included in the remedial activities covered by the document. References to SP-7 in Figures 2-1 and 2-2 will be removed as per response to Comment 4 above.

Action: Modify the second paragraph of Section 1.1 on Page 1-2 to read:

"Although a predesign investigation has been completed in Area 6 for the OU1 Stockpile Area (see PSP for Predesign Sampling in Area 6 SP-7/OU1 Stockpile Area (DOE June 2003), the predesign investigation for the SP-7 Area is not yet complete. Therefore, the SP-7 Stockpile Area is excluded from this document."

Remove the second sentence of the first paragraph of Section 2.2 that says:

"The northern part of the area is the former site of SP-7 and includes the current lined, above-WAC stockpile area."

6. **Commenting Organization:** OEPA **Commentor:** OFFO
Section #: 3.8 **Pg. #:** 3-4, 3-5 **Line #:** **Code:** C
Original Comment #: 6

Comment: This plan does not specify how the soil underneath the Waste Pit 4 cap material be handled once the cap material is removed. Please provide details for scanning and sampling the area after removal of the cap.

Response: A real time surface scan of the soil underneath the Waste Pit 4 cap material will be performed once the Pit 4 cap material has been removed.

Action: Add the following text to Section 3.3 after the end of the first paragraph on Page 3-3:

"After removal of Waste Pit 4 Cap Material, a real time surface scan of the area will be conducted to investigate potential above-WAC areas prior to excavation."

7. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.9 Pg.#: 3-5 Line #: Code: C
Original Comment #: 7
Comment: This section references the PSP for General Characterization for Sitewide Soil Remediation for precertification. This document has not been approved.
Response: These comments were written and received by DOE prior to agency approval of the PSP for General Characterization for Sitewide Soil Remediation. This document has now been approved.
Action: None.

8. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.9 Pg.#: 3-5 Line #: Code: C
Original Comment #: 8
Comment: The last paragraph states 'After precertification activities are completed, certification samples will be collected in preparation of the Area 6 CDL'. A Certification Design Letter lays out the plan for taking certification samples for an area, and is completed and approved *before* the CDL. Please correct.
Response: Agree. This sentence is incorrect as written.
Action: This sentence will be removed.

6